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May 28, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy
Federal Communication Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20544

92-235

Re: Spectrum Refarming Proposed Rulemaking - Docket 92-235

Dear Ms. Searcy:

The National Coal Association submits the following comments for consideration in the above-referenced docket related to spectrum refarming. The National Coal Association represents coal producers, transporters, users and attendant support industries. NCA's members account for over 60 percent of our nations annual coal production. Effective and reliable radio communications are an essential part of efficient and safe coal mining operations. The proposed rule will adversely affect the effective range and reliability of the coal industry's radio communication systems.

Coal mines are generally located in sparsely populated rural areas. A single mine, or several mines which comprise a mine complex, cover vast areas. For example, the Black Thunder mine located in Wvoming covers over 10,000 acres of land. Since 1978, coal

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The reduced transmitter power required under the proposal will substantially reduce the effective range of the industry's radio systems. The substantial reduction in the effective range and the overall adverse effect upon the reliability of system performance compromises the industry's capability to conduct efficient and safe mine operations.

The second phase of the proposal will essentially require full system changeout of existing mobile communications equipment in view of the incompatibility between current systems and the new equipment standards. One NCA member company has estimated that a full system changeout would cost over \$1 million at one of their large mines which operates over 500 radios and four repeaters. There are approximately 3000 producing coal mines in the United States.

It appears that the basis for this proposal arises from channel congestion in the densely populated urban areas on the east and west coasts. We submit that this concern can be addressed through a more focused and less costly rule that excludes sparsely populated and rural areas.

The National Coal Association appreciates your consideration of the coal industry's comments and concerns.

Sincerely,



Harold P. Quinn, Jr.
Senior Vice President
Legal and Regulatory Affairs